

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

In re:
Abraham L. Richardson, Sr.
Debtor(s)

Case No. 17-01963-EE
Chapter 13

DEBTOR'S MOTION TO MODIFY CHAPTER 13 PLAN

COMES NOW Debtor, by and through counsel, in the above filed and numbered case and moves to modify the Chapter 13 Plan for reasons to be shown below:

1. The Debtor(s) Chapter 13 Plan was confirmed by Order of this Court entered on October 5, 2017.
2. That Debtor's confirmed plan provides for the payment \$1,215.32 as the regular monthly mortgage payment and \$721.94 as an arrearage payment beginning July 2017 to Seterus on the Debtor's homestead property at 215 Elms Court Circle, Jackson, MS 39204.
3. Debtor moves to modify the confirmed plan to abandon to Seterus the homestead property located at 215 Elms Court Circle, Jackson, MS 39204.
4. Debtor moves that his Chapter 13 Plan payments be raised to cure any Chapter 13 Plan arrearage over the remaining term of his Chapter 13 Plan.
5. Debtor moves that the wage order be amended as necessary.

WHEREFORE, Debtor requests that this Motion be received and filed, and at a hearing hereon this Honorable Court will enter its Order sustaining Debtor's Motion to Modify, and for such other further relief as this Court may deem proper and just.

DATED: July 9, 2018

/s/ Michael G. Pond

Attorney for Debtor(s)

Certificate of Service

I, the undersigned attorney for the above referenced debtor(s), do hereby certify that I have this date served a true and correct copy of the foregoing *Debtor's Motion to Modify Plan* to the affected creditor(s) via First Class U. S. Mail and the case trustee and the U. S. Trustee via Notice of Electronic Filing (NEF) through the ECF system.

See attached list of creditors

Case Trustee: James L. Henley, Jr.

U. S. Trustee

DATED: July 9, 2018

/s/ Michael G. Pond

Attorney for Debtor(s)

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